



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

7 August 1996

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Revised Conceptual Pre-Design Site 09 Sampling Plan
Based on Discussions During 25 June 1996 BCT Meeting
Naval Construction Battalion Center, Davisville, Rhode Island
Submitted via Fax on 5 July 1996

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Division of Site Remediation has reviewed the above referenced document and comments are attached. It is understood that a detailed workplan will be submitted at a later date for regulatory review prior to the start of this activity.

If you have any questions or require additional information please call me at (401) 277 3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment

cc: W. Angell, DEM DSR
C. Williams, EPA Region 1

letter.rwg/richg

Comments for:

**Revised Conceptual Pre-Design Site 09 Sampling Plan
Based on Discussions During the 25 June 1996 BCT Meeting**

Submitted via Fax on 5 July 1996

1. General Comment:

There were two major concerns raised in the 25 June 1996 BCT meeting. The first was that there was insufficient groundwater sampling to demonstrate the worst case had been sampled from a chemical standpoint. The Navy has proposed sampling in the fall and spring. RIDEM stated at the 25 June 1996 BCT meeting that sampling should be done four times during the year to account for seasonal effects.

The second was that the modelling effort made certain assumptions regarding the geophysical characteristics of Allen Harbor itself. The initial phase sampling only indicates that the seismic reflection geophysical survey will be done in the harbor sediment adjacent to the landfill. It is recommended that this survey encompass the entire harbor out to Spinks Neck Point/Calf Pasture Point. This is necessary since the modelling effort showed some of the COCs to discharge to the harbor and beyond and would therefore aid in confirming the modelling assumptions. In addition, since the seismic survey may not accurately delineate geological strata or be subject to interferences an appropriate number of borings in the harbor should be performed to confirm the seismic survey results.

**2. Page 2, Section 1. Initial Phase Sampling, Spring 1997;
Post-Initial-Phase-Evaluation, Sentence 1.**

This sentence states that sediment/soil and groundwater will be evaluated to determine if there are indications of whether ground-water is a substantial contributor to offsite COCs. Please be advised that the BCT will need to determine beforehand what will be considered a substantial contributor to COCs.

**3. Page 2, Section 1. Initial Phase Sampling, Spring 1997;
Post-Initial-Phase-Evaluation, Sentence 2.**

If the data indicate that ground-water migration is not of sufficient concern to warrant additional containment and/or sampling, the sampling program will be complete and the BCT should recommend initiating the design and construction of the remedial components of the Site 09 remedial action as described in the Record of Decision.

Please be advised that the Record of Decision (ROD) will contain the provision of groundwater containment. If it is determined during the design phase that groundwater containment is not necessary then this aspect may be removed from the design.